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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Teresa Calma,

Plaintiff,

v.

Equifax Information Services, LLC;  
Experian Information Solutions, Inc.;  
and Pennymac Loan Services, LLC,

Defendants.

Case No.: 2:22-cv-02105-ART-EJY

**Motion for an extension of time for  
Defendant Experian Information  
Solutions, Inc. to respond to  
Plaintiff's complaint**

**First Request**

Teresa Calma ("Plaintiff"), by and through counsel, hereby requests an extension of time for Defendant Experian Information Solutions, Inc. ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading was due on January 11, 2022.

The extension is sought because the parties are engaged in active settlement discussions and informal discovery to assist the case resolution efforts. Plaintiff does not oppose an extension of Defendant's time to answer the complaint so that the parties may devote their energies to resolving this

1 matter.

2 This is the first request for an extension of this deadline and the request  
3 is made after the deadline has expired due to excusable neglect. Through  
4 counsel, Defendant requested that Plaintiff stipulate to an extension on January  
5 10, 2022 and Plaintiff agreed through counsel on January 11, 2022, but  
6 the parties failed to submit a request to the Court.

7 In good faith and not for the purposes of delay, Plaintiff submits  
8 this motion, on behalf of Defendant, and requests that this Court extend  
9 Defendant's deadline to file its responsive pleading until on or before  
10 **February 8, 2023.**

11  
12 Dated: January 24, 2023.

13  
14 **FREEDOM LAW FIRM, LLC**

15 /s/ Gerardo Avalos  
16 George Haines, Esq.  
17 Gerardo Avalos, Esq.  
18 8985 South Eastern Ave., Suite 350  
19 Las Vegas, NV 89123  
20 *Attorneys for Plaintiff*

21  
22 IT IS SO ORDERED:

23   
24 Dayna J. Zouchak  
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: January 24, 2023  
27